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15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re

Case No. 23-30564

18 THE ROMAN CATHOLIC ARCHBISHOP
19 OF SAN FRANCISCO,

Chapter 11

20 Debtor and
21 Debtor in Possession.

**DECLARATION OF JEANNIE KIM
IN SUPPORT OF STATEMENT OF
COMPLIANCE WITH NOTICING
PROVISIONS OF BAR DATE ORDER**

22 I, Jeannie Kim, declare as follows:

23 1. I am an attorney duly admitted to practice in this Court. I am an associate with
24 Sheppard, Mullin, Richter & Hampton LLP, attorneys for The Roman Catholic Bishop of San
25 Francisco, the debtor and debtor in possession herein (the “RCASF” or the “Debtor”). I have personal
26 knowledge of the facts contained in this declaration, except as to matters alleged upon information
27 and belief and as to those matters I believe them to be true. If called upon as a witness, I could and
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1 would testify to all facts within my personal knowledge except where stated upon information and
2 belief.

3 2. I make this declaration in support of the Debtor's statement of compliance (the
4 "Statement") with noticing provisions set forth in the Court's *Order: (1) Fixing Time for Filing*
5 *Proofs of Claim; (2) Approving Proof of Claim Forms; (3) Providing Confidential Protocols; and*
6 *(4) Approving Form and Manner of Notice* [ECF No. 337] (the "Bar Date Order").¹ I was personally
7 involved in the efforts to design and implement the Debtor's efforts to serve and publicize the notice
8 of the deadlines for filing claims in this matter. In this regard, I worked closely with Peter Marlow
9 (the Debtor's Director of Communications), Peter Egloff (Miller Legal Services, a division of Miller
10 Advertising Agency, Inc.), Rocio Rodriguez (Debtor's Archdiocesan Victim Assistance
11 Coordinator), and Omni Agent Solutions, Inc. ("Omni").

12 3. Promptly following entry of the Bar Date Order the Debtor's noticing and claims
13 agent Omni prominently posted on the Omni's website for the Debtor (the "Omni Site") the Survivor
14 Claims Bar Date Notice, the Confidential Survivor Proof of Claim Form, and the General Proof of
15 Claim Form (final dated versions of the forms approved in the Bar Date Order, Exhibits E, and B,
16 respectively) and enabled the Omni Site to accept electronically filed claims. Specifically, Omni
17 (a) listed the Bar Date as a "Critical Date" within the "Critical Dates" tile on the Omni Site; (b)
18 enabled the website to accept filing of General Proofs of Claim and Confidential Survivor Proofs of
19 Claim; (c) created a separate "Claims" tile on the Omni Site with links to (i) the claims portals
20 (separate portals for General Proofs of Claim and Confidential Survivor Proofs of Claim), (ii) the
21 proofs of claim docket, and (iii) withdrawals of claims; and (d) generated links for creditors to (i)
22 file General and Confidential Survivor Proofs of Claim; (ii) access the proofs of claim docket; (iii)
23 file a change of address; and (iv) withdraw claims under the "Claims" tab on the dashboard, located
24 at the top of the Omni Site.

25 4. Bar Date Order ¶ 12. Promptly following entry of the Bar Date Order, the Debtor
26 caused the filing of the General Bar Date Notice (in substantially the form attached as Exhibit D

27
28 ¹ All terms not otherwise defined herein have the same meaning as in the Bar Date Order.

1 to the Bar Date Order and as filed with the Court at ECF No. 350) and Proof of Claim (in
2 substantially the form attached as Exhibit A to the Bar Date Order and as filed with the Court at
3 ECF No. 350) on November 29, 2023. Accordingly, the General Bar Date Notice and Proof of
4 Claim were served on all registered ECF participants in this bankruptcy case on the same date.
5 *See* ECF Nos. 350 and 351. Thereafter, I worked with Omni to implement service, by United
6 States mail, first-class postage prepaid, of the General Bar Date Notice and Proof of Claim on (a)
7 all known entities holding potential prepetition claims against the Debtor, and their counsel (if
8 known); (b) all parties that have requested special notice in this case; and (c) the United States
9 Trustee on December 6, 2023, in compliance with paragraph 12 of the Bar Date Order. *See* ECF
10 No. 463 (redacted public filed version).

11 5. Bar Date Order ¶ 13. Promptly following entry of the Bar Date Order, the Debtor
12 caused the filing of the Survivor Claim Bar Date Notice (in substantially the form attached as
13 Exhibit E to the Bar Date Order and as filed with the Court at ECF No. 349) and Confidential
14 Survivor Proof of Claim² (in substantially the form attached as Exhibit B to the Bar Date Order
15 and as filed with the Court at ECF No. 349) on November 29, 2023. Accordingly, the
16 Confidential Proof of Claim Package was served on all registered ECF participants in this
17 bankruptcy case on the same date. *See* ECF Nos. 349 and 351. Thereafter, I worked with Omni
18 to implement service, by United States mail, first-class postage prepaid, of the Confidential Proof
19 of Claim Package upon all known Survivor Claimants (via a Survivor Claimant's counsel, if
20 known and expressly requested to be served in this manner, or for those Survivor Claimants who
21 were not known to be represented by counsel, on the Survivor Claimant him or herself). *See* ECF
22 No. 465 (redacted public filed version).

23 6. The Bar Date Order provides at paragraph 13 that the Debtor shall give notice of the
24 Confidential Proof of Claim Package by United States mail, first-class postage prepaid, upon all
25 known Survivor Claimants and their counsel, if known. Footnote 4 immediately following this
26

27 ² Together, the Survivor Claim Bar Date Notice and the Confidential Survivor Proof of Claim may
28 be referenced in this declaration as the "Confidential Proof of Claim Package."

1 provision says, "If a Survivor Claimant's counsel has appeared in the bankruptcy case on behalf of
2 a Survivor claimant or provided written consent to Debtor's counsel, the Debtor is authorized to
3 serve the Survivor Claimant's counsel with the Survival Claim Bar Date Notice."

4 7. Promptly following entry of the Bar Date Order, working both with counsel for the
5 Committee and directly with counsel for certain Survivor Claimants, I arranged to remove from the
6 service list directing mailing of notices to Survivor Claimants (a) those Survivor Claimants
7 identified by that particular Survivor Claimant's counsel as requesting, via written request and
8 authorization, service of the Confidential Proof of Claim Package on counsel only; and (b) those
9 Survivor Claimants who are formally represented by an attorney who has formally appeared in the
10 bankruptcy case on behalf of the Survivor Claimant.

11 8. Bar Date Order ¶ 14. I worked with Messrs. Marlow and Egloff to assist the Debtor
12 with its efforts to comply with the provisions set forth in paragraph 14 of the Bar Date Order.
13 The details of the Debtor's efforts to comply to paragraph 14 are set forth in greater detail in the
14 declarations of Messrs. Marlow and Egloff filed concurrently with the Statement and this
15 declaration.

16 9. In addition to the above actions called for by the Bar Date Order, on August 21, 2023,
17 the Debtor filed and served a Notice of Automatic Stay of Proceedings as a result of the Debtor's
18 filing of a chapter 11 petition, in the pending coordinated proceeding in Alameda Superior Court,
19 JCCP 5108, where all complaints against all northern California diocesan entities are being jointly
20 administered. The Notice was served on all plaintiff's counsel for all plaintiffs in JCCP 5108. There
21 are well over 1,500 survivor lawsuits pending in JCCP 5108.

22 I declare under penalty of perjury under the laws of the United States that the foregoing
23 facts are true and correct.

24 Executed on this 15th day of April, 2024, at San Francisco, California.

25 /s/ Jeannie Kim

26 Jeannie Kim
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